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July 29, 2016

Via Certified Mail - Return Receipt Requested
Managing Agent
Brown Line LLC
3814 Old Highway 99 South
Mount Vernon WA 98273

RECEIVED ON:

AUG - 3 2016

EPA Region 10
Office of the Regional Administrator

Jack Hilde, President
Brownline Inc.
PO Box 1708
Mount Vernon WA 98273-1708

Lynden Incorporated
18000 International Blvd, Ste 800
Seattle, WA 98188-4263

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent and Brown Line Facility Owner:

We represent Waste Action Project, PO Box 9281, Covington, WA 98042, (206) 849-5927. Any response or correspondence related to this matter should be directed to Smith & Lowney, P.L.L.C. at the letterhead address. This letter is to provide you with sixty days notice of Waste Action Project's intent to file a citizen suit against Brown Line, LLC and Brownline Inc. ("Brown Line") under section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Brown Line's National Pollution Discharge Elimination System ("NPDES") permit.

Brown Line was granted coverage effective December 28, 1992, under Washington's Industrial Stormwater General Permit ("ISGP") issued by the Washington Department of Ecology ("Ecology"). The presently applicable ISGP became effective September 20, 2002, was modified on December 1, 2004, reissued on August 15, 2007, effective September 15, 2007, reissued again on October 15, 2008, effective November 15, 2008, and remaining effective through December 31, 2009, under NPDES permit No. SO3000396 (the "2002 Permit"). Brown Line was granted coverage under the subsequent iteration of the Washington ISGP issued by Ecology on October 21, 2009, effective January 1, 2010,

modified May 16, 2012, effective July 1, 2012, and remaining effective through January 1, 2015, under NPDES Permit No. WAR000396 (the "2010 Permit"). Ecology granted coverage under the current iteration of the ISGP, issued by Ecology on December 3, 2014, effective January 2, 2015, and set to expire on December 31, 2019, (the "2015 Permit") and maintains the same permit number, WAR000396.

Brown Line has violated and continues to violate the terms and conditions of the 2010 Permit and 2015 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from, its facility, located at or near 3814 Old Highway 99 South, Mount Vernon, WA 98273 (the "Facility"). The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Brown Line.

I. COMPLIANCE WITH STANDARDS.

A. Violations of Water Quality Standards.

Condition S10.A of the Permits prohibit discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric standards. Furthermore, narrative water quality standards apply with equal force, even when Ecology has established numeric water quality standards. Specifically, Condition S10.A of the Permits require Brown Line's discharges not cause or contribute to violations of Washington State's water quality standards.

Brown Line discharges stormwater to the Skagit River via a drainage ditch. Brown Line discharges stormwater that contains elevated levels of copper, zinc, and turbidity as indicated in the table of discharge monitoring data below. Discharges of stormwater and/or wastewater from the facility cause and/or contribute to violations of water quality standards for zinc, copper, oil sheen, petroleum hydrocarbons, and turbidity and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. These water quality standards include those set forth in WAC 173-201A-200(1)(e), -240, and -260(2). Precipitation data from the last five years are appended to this notice of intent to sue and identify days when precipitation met or exceeded 0.1 inches per day.

TABLE 1: DMR Data for Brown Line, Inc.
Outfall A (Alpha)

2010 ISGP Benchmarks	Turb (25 NTU)	Cu (14 µg/L)	Zn (117 µg/L)	Oil sheen (No)	O&G	
1Q 2010	25	ND	ND*	No		
2Q 2010	13.3	5	19*	No		Metals reported as 0.005, 0.019
3Q2010	5.77	NA	**150***	No		Zn reported as 0.15
4Q 2010	17.5	NA	89*	No		Zn reported as 0.089
1Q 2011	16.1	NA	26*	No		Zn reported as 0.026
2Q 2011	23.6	**19**	**170***	No		Metals reported as 0.17, 0.019
3Q 2011	12.8	NA	59*	No		Zn reported as 0.059
4Q 2011	11.2	NA	26*	No		Zn reported as 0.026
1Q 2012	**80.6**	**19**	**235***	No		Metals reported as 0.019 and 0.235
2Q 2012	7.11	NA	73*	No		Z reported as 0.073
3Q 2012						"No measurable rain fall for the 3rd quarter of 2012"
4Q 2012	**106**	**28**	**260***	No		Zn and Cu reported as 0.260, 0.028
1Q 2013	**32.2**	0	**136***	No		Zn reported as 0.136
2Q 2013	**81.2**	0	**141***	No		Zn reported as 0.141
3Q 2013	**97.1**	**104**	**1933***	No	12.6	Zn and Cu reported as 1.933, 0.104. Metals data in lab report shows units are mg/L.
4Q 2013						No DMR found
1Q 2014	**45.8**	0	**346***	No		Zn reported as 0.346
2Q 2014	**31.6**	NA	15*	No		Zn reported as 0.015
3Q 2014	23	NA	78*	No		Zn reported at .078
4Q 2014	***61.6***		***203****			
2015 ISGP Benchmarks	Turb (25 NTU)	Cu (14 µg/L)	Zn (117 µg/L)	Oil sheen (No)	TPH** (10mg/L)	
1Q 2015	18.2	NA	**118***	No		Zn reported as 0.118
2Q 2015						"No Measurable rainfall on the 2nd qtr"
3Q 2015	**33.6**	B	70*	No	E	Zn report as .070
4Q 2015	**9.91**	B	**1030***	No	E	Zn reported at 1.03
1Q 2016	**53.0**	E	67	No	E	Zn reported at 67 µg/L
2Q 2016	**9.9**	0	**1020***	No	E	Zn reported as 1.02

* It appears the facility reported its zinc and copper values in mg/L instead of µg/L, Waste Action Project converted the values to µg and included the reported result in the "Notes" column.
**TPH: Total Petroleum Hydrocarbons
Reporting Codes Used: E - Analysis Not Complete/ Not Conducted/Not Reported B - Below Detection Limit/No Detection

B. Compliance with Standards.

Condition S10.C of the Permits requires Brown Line to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparing and implementing an adequate SWPPP and best management practices ("BMPs"). Brown Line has violated and continues to violate these conditions by failing to apply AKART to its discharges by, among other things, failing to implement an adequate

SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge. *See* Table 1. These violations have occurred on each and every day for the previous five years and continue to occur every day.

Condition S1.A of the Permits requires that all discharges and activities authorized be consistent with the terms and conditions of the permit. Brown Line has violated this condition by discharging and acting inconsistently with the conditions of the Permits as described in this Notice of Intent to Sue.

II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

Brown Line has not developed and implemented a SWPPP that complies with the requirements of the Permits. In the following section, upon information and belief, Waste Action Project asserts that the SWPPP and its implementation violate the Permits as follows.

Condition S3.A.1 of the Permits requires Brown Line to develop and implement a SWPPP as specified in these permits. Condition S3.A.2 of the Permits require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Brown Line has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART and BMPs necessary to comply with state water quality standards.

Condition S3.A of the Permits requires Brown Line to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. On information and belief, Brown Line has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, is not fully implemented, and has not been updated as necessary.

The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.B.4 of the 2015 Permit requires that the SWPPP detail how and where the selected BMPs will be implemented. Condition S3.A.3 of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Brown Line's SWPPP does not comply with these requirements because it does not adequately describe and explain in detail the BMPs selected, does not include BMPs consistent with approved stormwater technical manuals, and does not include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

Brown Line's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, the regular business hours, and the seasonal variations in business hours or in industrial activities.

Brown Line's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

Brown Line's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these permit conditions.

Brown Line's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for each material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

Brown Line's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs and implement certain mandatory BMPs unless site conditions render the BMP unnecessary,

infeasible, or an alternative and equally effective BMP are provided. Brown Line is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

Brown Line's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage and treatment facilities, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Brown Line will comply with signature and record retention requirements, certification of compliance with the SWPPP and Permit, and all inspection reports completed by Brown Line).

Brown Line's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

Brown Line's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Brown Line's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

Brown Line's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

Brown Line's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies

parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

III. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits requires Brown Line to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permits require Brown Line to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. Discharge points may include, but are not limited to drains, piers, docks, loading areas, and fueling areas where industrial activities occur. Conditions S3.B.5.b and S4.B.2.c set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met.

Brown Line violated these requirements by failing to collect stormwater samples at any of its discharge points during the following quarters:

3rd Quarter 2012
4th Quarter 2013
3rd Quarter 2014
2nd Quarter 2015

These violations have occurred and continue to occur each and every quarter during the last five years that Brown Line was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not all, points of discharge. These violations will continue until Brown Line commences monitoring all distinct points of discharge and taking representative samples.

B. Failure to Analyze Quarterly Samples.

Conditions S5.A.1 and S5.B.1 of the Permits require Brown Line to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, oil sheen, and petroleum hydrocarbons (NWTPHDx).

Brown Line violated these conditions by failing to analyze stormwater samples from each distinct discharge point for any of the required parameters during the following quarters as further specified in Table 1 above:

3rd Quarter 2010
4th Quarter 2010
1st Quarter 2011
3rd Quarter 2011
4th Quarter 2011
1st Quarter 2013
2nd Quarter 2013

4th Quarter 2013
1st Quarter 2014
2nd Quarter 2014
3rd Quarter 2014
4th Quarter 2014
1st Quarter 2015
2nd Quarter 2015
3rd Quarter 2015
4th Quarter 2015
1st Quarter 2016
2nd Quarter 2016

C. Failure to Timely Submit Discharge Monitoring Reports.

Condition S9.A of the Permits require Brown Line to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. Brown Line failed to properly submit DMRs For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Brown Line has violated these conditions by failing to timely submit a DMR within the time prescribed for the following quarters:

4th Quarter 2010 (Late)
2nd Quarter 2012 (Late)
4th Quarter 2013
2nd Quarter 2015 (Late)

D. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the Permits requires that monthly visual inspections be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Condition S7.C of the Permits requires that Brown Line record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits, a summary report and schedule of implementation of the remedial actions that Brown Line plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and

certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Brown Line is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists for each visual monitoring and inspection, and failed to make the requisite certifications and summaries for each visual monitoring and inspection.

IV. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements of the Permits.

Condition S8.B of the Permits requires Brown Line take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH. Condition S8.A of the 2015 Permit requires that Brown Line implement any Level One Corrective Action required by the 2010 Permit.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires Brown Line: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.4 of the Permits requires that Brown Line implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Tables 2 and 3 of the Permits establish the following benchmarks: turbidity 25 NTU; pH 5 – 9 SU; total copper 14 µg/L; total zinc 117 µg/L; and petroleum hydrocarbons (diesel fraction NWTPHDx) <=10 mg/L.

Brown Line has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since January 1, 2010, that quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 in Section I.A. of this letter.

These benchmark excursions are based upon information currently available to Waste Action Project from Ecology's publicly available records. Waste Action Project provides notice of its intent to sue Brown Line for failing to comply with all of the Level One Corrective Action requirements described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and

certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 above.

B. Violations of the Level Two Requirements of the Permits.

Condition S8.C of the Permits requires Brown Line take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any two quarters during a calendar year. Condition S8.A of the 2015 Permit requires that Brown Line implement any Level Two Corrective Action required by the 2010 Permit.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires Brown Line: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and sign and certify the revised SWPPP in accordance with Condition S3 of the Permits; and (3) summarize the Level Two Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permits. Condition S8.C.4 of the Permits requires that Brown Line implement the revised SWPPP according to Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than August 31st of the following year.

The Permits establish the benchmarks applicable to Brown Line described in Section IV.A of this notice of intent to sue letter.

Brown Line has violated the requirements of the Permits described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs to ensure that all points of discharge from the facility meet benchmarks (not just the sampled point of discharge), including additional structural source control BMPs, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any two quarters during a calendar year. As indicated in Table 1 in Section I.A of this letter, these violations include, but are not limited to, Brown Line's failure to fulfill these obligations for turbidity, zinc, and copper triggered by its stormwater sampling during the calendar year of 2013 and every year since.

The benchmark excursions identified in Table 1 of this notice of intent to sue letter are based upon information currently available to Waste Action Project from Ecology's publicly available records. Waste Action Project provides notice of its intent to sue Brown Line for failing to comply with all of the Level Two Corrective Action requirements each and every time quarterly stormwater sample results exceeded an applicable benchmark value or were outside the benchmark range for pH for any two quarters during a calendar year, including any such excursions that are not reflected in Table 1 above, during the last five years.

C. Violations of the Level Three Requirements of the Permits.

Condition S8.D of the Permits requires Brown Line to take specified actions, called a "Level Three Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any three quarters during a calendar year. Condition S8.A of the 2015 Permit requires that Brown Line implement any Level Three Corrective Action required by the 2010 Permit.

As described by Condition S8.D of the Permits, a Level Three Corrective Action requires that Brown Line: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level Three Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permits, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or it new/additional treatment BMPs will be installed. Condition S8.D.2.b of the Permits requires that a licensed professional engineer, geologist, hydrogeologist, or certified professional in storm water quality must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the Permits requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, Brown Line submit an engineering report, plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the Permits requires that Brown Line fully implement the revised SWPPP according to condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permits establish the benchmarks applicable to Brown Line described in Section IV.A of this notice of intent to sue letter.

Brown Line has violated the requirements of the Permits described above by failing to conduct a Level Three Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, including the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment, the required implementation of additional BMPs, including additional treatment BMPs to ensure that all points of discharge from the facility meet benchmarks (not just the sampled point of

discharge), the required submission of an engineering report, plans, specifications, and an operations and maintenance plan, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any three quarters during a calendar year. As indicated in Table 1 in Section I.A of this letter, these violations include, but are not limited to, Brown Line's failure to fulfill these obligations for turbidity and zinc triggered by its stormwater sampling during the calendar year of 2013.

The benchmark excursions identified in Table 1 of this notice of intent to sue letter are based upon information currently available to Waste Action Project from Ecology's publicly available records. Waste Action Project provides notice of its intent to sue Brown Line for failing to comply with all of the Level Three Corrective Action requirements each and every time quarterly stormwater sample results exceeded an applicable benchmark value or were outside the benchmark range for pH for any three quarters during a calendar year, including any such excursions that are not reflected in Table 1 above, during the last five years.

V. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.

Condition S9.B of the Permits requires Brown Line to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Condition S8.B through S8.D. If a corrective action is not yet completed at the time of submission of the annual report, Brown Line must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date Brown Line expects to complete corrective actions. Brown Line has violated this condition by failing to include all of the required information in the annual report it submitted for the past five years.

The annual report submitted by Brown Line for 2010 (submitted May 25, 2011) does not include the required information. Brown Line claimed they did not exceed any benchmark for any parameter and did not describe any problems and corrective actions.

The annual report submitted by Brown Line for 2011 (submitted on May 18, 2012) does not include the required information. Brown Line again claimed they did not exceed any benchmark for any parameter and did not describe any problems and corrective actions.

The annual report submitted by Brown Line for 2012 (submitted late on July 26, 2013) does not include the required information. Brown Line again claimed they did not exceed any benchmark for any parameter and did not describe any problems and corrective actions.

Brown Line failed to submit an annual report for 2013.

Brown Line failed to submit an annual report for 2014.

Brown Line failed to submit an annual report for 2015.

VI. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B.3 of the Permits requires Brown Line record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Brown Line collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Brown Line could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, Brown Line is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records.

Condition S9.C of the Permits requires Brown Line to retain for a minimum of five years a copy of the Permits, a copy of Brown Line's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permits. Upon information and belief, Brown Line is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

VII. PROHIBITED DISCHARGES.

Condition S5.E. of the Permits prohibits illicit discharges and the discharge of process wastewater. Appendix 2 of the Permits defines "illicit discharges" to include "any *discharge* that is not composed entirely of *stormwater* except (1) discharges authorized pursuant to a separate NPDES permit, or (2) conditionally authorized non-stormwater discharge identified in Condition S5.D." Appendix 2 of the Permits defines stormwater as "that portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a stormwater drainage system into a defined surface water body, or a constructed infiltration facility." In contrast to stormwater, Appendix 2 of the Permits defines leachate as "water or other liquid that has percolated through raw material, product, or waste and contains substances in solution or suspension as a result of the contact with these materials," and process wastewater as "any non-stormwater which, during manufacturing or processing, comes into direct contact or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product."

On information and belief, Brown Line has violated and continues to violate these conditions due to its non-stormwater discharges from the Facility. These non-stormwater

discharges from the Facility may include, but are not limited to, discharges of wash water from the wheel wash and/or other equipment washing areas.

VIII. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the 2015 Permit, Waste Action Project hereby requests that Brown Line Inc. provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Brown Line fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit, it will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any ensuing lawsuit.

IX. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Waste Action Project. These violations are ongoing. Waste Action Project intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to $37,500 per day for each violation. In addition to civil penalties, Waste Action Project will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 USC § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Waste Action Project believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. Waste Action Project intends, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Brown Line under Section 505(a) of the Clean Water Act for the violations described herein.

Waste Action Project is willing to discuss effective remedies for the violations described in this letter and settlement terms during the 60-day notice period. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within ten (10) days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By: Meredith A. Crafton
Knoll D. Lowney
Meredith A. Crafton

cc: Gina McCarthy, Administrator, U.S. EPA
Dennis McLerran, Region 10 Administrator, U.S. EPA
Maia Bellon, Director, Washington Department of Ecology
Jon Burdick, Manager, Lynden Inc, 18000 International Blvd, Ste 800, Seattle WA 98188

Date	Precip. (in)	Events
2011	Precip. (in)	Events
Jun	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0.91	
7	0.09	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0.03	
14	0	
15	0.04	
16	0	
17	0	
18	0.33	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0.02	
30	0.25	

2011	Precip. (in)	Events
Jul	sum	
1	0.04	
2	0	
3	0.04	
4	0	
5	0	
6	0	
7	0	
8	0.01	
9	0	
10	0	
11	0	
12	0	
13	0.07	
14	0.16	
15	0	
16	0.11	
17	0.06	
18	0	
19	0	
20	0	
21	0.12	
22	0	
23	0	
24	0	
25	0.16	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	

2011	Precip. (in)	Events
Aug	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0.12	
23	0.05	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	

2011	Precip. (in)	Events
Sep	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0.39	
23	0	
24	0	
25	0.09	
26	0.26	
27	0.03	
28	0	
29	0	
30	0	

Date	Precip. (in)	Events
2011	**Precip. (in)**	**Events**
Oct	sum	
1	0	
2	0.02	
3	0	
4	0	
5	0.1	
6	0	
7	0.27	
8	0	
9	0	
10	0.01	
11	0.07	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0.07	
21	0.07	
22	0.42	
23	0	
24	0	
25	0	
26	0.01	
27	0	
28	0.24	
29	0	
30	0.07	
31	0	

2011	**Precip. (in)**	**Events**
Nov	sum	
1	0	
2	0.32	
3	0.06	
4	0	
5	0	
6	0	
7	0.09	
8	0.05	
9	0	
10	0	
11	0.46	
12	0.3	
13	0.04	
14	0	
15	0	
16	0	
17	0.01	
18	0.09	
19	0	
20	0	
21	0.03	
22	0.69	
23	0.43	
24	0.11	
25	0	
26	0	
27	0.13	
28	0	
29	0	
30	0	

2011	**Precip. (in)**	**Events**
Dec	sum	
1	0	
2	0	
3	0.03	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0.03	
16	0.01	
17	0	
18	0.18	
19	0	
20	0.02	
21	0	
22	0	
23	0	
24	0.15	
25	0.03	
26	0.06	
27	0.11	
28	0.08	
29	0.13	
30	0.09	
31	0	

2012	**Precip. (in)**	**Events**
Jan	sum	
1	0	
2	0.13	
3	0.12	
4	0.33	
5	0.19	
6	0	
7	0.02	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0.27	
15	0.08	
16	0	
17	0.09	
18	0.01	
19	0	
20	0.07	
21	0.25	
22	0.03	
23	0	
24	0.11	
25	0.07	
26	0	
27	0	
28	0	
29	0.45	
30	0.01	
31	0	

Date	Precip. (in)	Events
2012	Precip. (in)	Events
Feb	sum	
1	0.22	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0.04	
9	0.24	
10	0.02	
11	0	
12	0.01	
13	0.07	
14	0.04	
15	0	
16	0.04	
17	0.29	
18	0.34	
19	0	
20	0.02	
21	1.65	
22	0.14	
23	0	
24	0.01	
25	0.18	
26	0	
27	0	
28	0	
29	0.03	

2012	Precip. (in)	Events
Mar	sum	
1	0.02	
2	0.09	
3	0.13	
4	0	
5	0.15	
6	0.14	
7	0	
8	0	
9	0.19	
10	0.2	
11	0.23	
12	0.11	
13	0.29	
14	0	
15	0	
16	0.03	
17	0.1	
18	0.03	
19	0	
20	0.08	
21	0.29	
22	0	
23	0	
24	0	
25	0	
26	0.04	
27	0	
28	0	
29	0.55	
30	0.12	
31	0.06	

2012	Precip. (in)	Events
Apr	sum	
1	0.25	
2	0	
3	0.49	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0.22	
12	0	
13	0	
14	0	
15	0	
16	0.54	
17	0.02	
18	0.01	
19	0.58	
20	0.28	
21	0	
22	0	
23	0	
24	0.14	
25	0.13	
26	0.36	
27	0.01	
28	0	
29	0.03	
30	0.37	

2012	Precip. (in)	Events
May	sum	
1	0.23	
2	0	
3	0.24	
4	0.22	
5	0.04	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0.29	
21	0.4	
22	0.07	
23	0.16	
24	0	
25	0	
26	0	
27	0	
28	0.01	
29	0.01	
30	0.03	
31	0.05	

2012	Precip. (in)	Events

Date	Precip. (in)	Events
Jun	sum	
1	0.18	
2	0.03	
3	0	
4	0.03	
5	0.14	
6	0	
7	0.13	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0.52	
17	0.3	
18	0.24	
19	0.03	
20	0	
21	0	
22	0.57	
23	0.6	
24	0	
25	0	
26	0	
27	0	
28	0.02	
29	0	
30	0.07	

2012	Precip. (in)	Events
Jul	sum	
1	0	
2	0.06	
3	0.54	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0.19	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0.15	
21	0	
22	0.16	
23	0.05	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	

2012	Precip. (in)	Events
Aug	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0.97	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0.02	
30	0	
31	0	

2012	Precip. (in)	Events
Sep	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0.13	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0.85	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	

Date	Precip. (in)	Events
2012	**Precip. (in)**	**Events**
Oct	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0.14	
13	0.26	
14	0.28	
15	0.44	
16	0	
17	0	
18	0.34	
19	0.23	
20	0	
21	0.04	
22	0.12	
23	0.09	
24	0.07	
25	0.08	
26	0.17	
27	0.33	
28	0.07	
29	0.05	
30	0.39	
31	0.31	
2012	**Precip. (in)**	**Events**
Nov	sum	
1	0.01	
2	1.03	
3	0.02	
4	0.29	
5	0	
6	0.01	
7	0	
8	0	
9	0	
10	0	
11	0.2	
12	0.01	
13	0.34	
14	0.01	
15	0	
16	0.06	
17	0.43	
18	0.05	
19	1.08	
20	0.02	
21	0.19	
22	0.02	
23	0.3	
24	0	
25	0	
26	0	
27	0	
28	0.01	
29	0.04	
30	0.19	
2012	**Precip. (in)**	**Events**
Dec	sum	
1	0.02	
2	0.17	
3	0	
4	0.25	
5	0	
6	0.13	
7	0.31	
8	0	
9	0.06	
10	0.17	
11	0.21	
12	0.14	
13	0.7	
14	0.08	
15	0.11	
16	0.02	
17	0.23	
18	0	
19	0.07	
20	0.3	
21	0.01	
22	0.1	
23	0.1	
24	0.03	
25	0.1	
26	0.14	
27	0.02	
28	0	
29	0.14	
30	0	
31	0	
2013	**Precip. (in)**	**Events**
Jan	sum	
1	0	
2	0	
3	0	
4	0	
5	0.1	
6	0.16	
7	0.33	
8	0.29	
9	0.28	
10	0.08	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0.13	
24	0.05	
25	0	
26	0.46	
27	0.55	

Date	Precip. (in)	Events
28	0.28	
29	0.69	
30	0.25	
31	0.19	

2013	Precip. (in)	Events
Feb	sum	
1	0	
2	0	
3	0.14	
4	0.01	
5	0	
6	0	
7	0.05	
8	0	
9	0	
10	0	
11	0.01	
12	0	
13	0.01	
14	0.12	
15	0	
16	0	
17	0.15	
18	0	
19	0.28	
20	0	
21	0.09	
22	0.29	
23	0.05	
24	0	
25	1.47	
26	0	
27	1.01	
28	0.24	

2013	Precip. (in)	Events
Mar	sum	
1	0.09	
2	0.02	
3	0	
4	0	
5	0.01	
6	0.29	
7	0.1	
8	0	
9	0	
10	0	
11	0.05	
12	0.39	
13	0.26	
14	0.05	
15	0.02	
16	0.14	
17	0	
18	0.06	
19	0	
20	0.38	
21	0	
22	0	
23	0	
24	0.98	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	

2013	Precip. (in)	Events
Apr	sum	
1	0	
2	0	
3	0	
4	0.22	
5	0.45	
6	0.62	
7	0.86	
8	0.02	
9	0	
10	0.15	
11	0	
12	0.17	
13	0.27	
14	0.02	
15	0.77	
16	0	
17	0	
18	0.35	
19	0.51	
20	0.04	
21	0	
22	0.97	
23	0	
24	0	
25	0	
26	0	
27	0.14	
28	0	
29	0.03	
30	0.07	

2013	Precip. (in)	Events
May	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0.73	
9	0	
10	0	
11	0	
12	0.22	
13	0.21	
14	0	
15	0.05	
16	0	
17	0.16	
18	0.18	
19	0	
20	0	
21	0.29	
22	0.36	
23	0.02	
24	0	
25	0.01	
26	0.33	

Date	Precip. (in)	Events
27	0.12	
28	0	
29	0.01	
30	0.24	
31	0	

2013	Precip. (in)	Events
Jun	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0.01	
13	0	
14	0	
15	0	
16	0	
17	0.01	
18	0	
19	0	
20	0.49	
21	0.68	
22	0	
23	0.01	
24	0.04	
25	0.14	
26	0.01	
27	0.07	
28	0	
29	0	
30	0	

2013	Preeip. (in)	Events
Jul	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0.05	
12	0	
13	0	
14	0.15	
15	0.01	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0.05	
25	0	
26	0	
27	0.06	
28	0.07	
29	0.45	
30	0	
31	0	

2013	Precip. (in)	Events
Sep	sum	
1	0	
2	0	
3	0.12	
4	0	
5	0.28	
6	0.35	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0.28	
16	0.3	
17	0	
18	0	
19	0	
20	0.04	
21	0	
22	0.26	
23	0.25	

Date	Precip. (in)	Events
24	0	
25	0.02	
26	0	
27	0.15	
28	0.74	
29	0.19	
30	0.18	

2013	Precip. (in)	Events
Oct	sum	
1	0.15	
2	0.53	
3	0	
4	0	
5	0	
6	0	
7	0.29	
8	0.06	
9	0	
10	0	
11	0	
12	0.02	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0.12	
28	0	
29	0	
30	0	
31	0.18	

2013	Precip. (in)	Events
Nov	sum	
1	0.03	
2	0.56	
3	0.09	
4	0.04	
5	0.07	
6	0.01	
7	0.28	
8	0.01	
9	0	
10	0	
11	0	
12	0.01	
13	0.01	
14	0.23	
15	0.86	
16	0.04	
17	0.01	
18	0.44	
19	0.23	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0.04	
30	0.3	

2013	Precip. (in)	Events
Dec	sum	
1	0.46	
2	0.04	
3	0.84	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0.05	
13	0.03	
14	0	
15	0.08	
16	0	
17	0	
18	0	
19	0	
20	0.29	
21	0.16	
22	0.47	
23	0.26	
24	0	
25	0	
26	0.01	
27	0.14	
28	0	
29	0	
30	0.05	
31	0.04	

2014	Precip. (in)	Events
Jan	sum	
1	0	
2	0.6	
3	0	
4	0	
5	0	
6	0	
7	0.38	
8	0.07	
9	0.01	
10	0.15	
11	0.44	
12	0.57	
13	0.03	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0.04	
23	0	
24	0	

Date	Precip. (in)	Events
25	0	
26	0	
27	0	
28	0	
29	0.58	
30	0.56	
31	0.02	

2014	Precip. (in)	Events
Feb	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0.32	
11	0.05	
12	0.01	
13	0.1	
14	0.03	
15	0.11	
16	0.18	
17	0.22	
18	0.12	
19	0.05	
20	0.02	
21	0.01	
22	0.37	
23	0.75	
24	0.48	
25	0.01	
26	0	
27	0.01	
28	0	

2014	Precip. (in)	Events
Mar	sum	
1	0.02	
2	0.19	
3	0.24	
4	0.17	
5	0.55	
6	0.12	
7	0.02	
8	0.1	
9	0.01	
10	0.01	
11	0	
12	0	
13	0	
14	0.79	
15	0.4	
16	0.65	
17	0	
18	0	
19	0.33	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0.14	
26	0.03	
27	0	
28	0.12	
29	0.08	
30	0.21	
31	0	

2014	Precip. (in)	Events
Apr	sum	
1	0	
2	0	
3	0	
4	0.17	
5	0.12	
6	0	
7	0	
8	0.19	
9	0.39	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0.06	
16	0.25	
17	0.44	
18	0	
19	0.06	
20	0	
21	0.02	
22	0.26	
23	0.07	
24	0.88	
25	0.14	
26	0.11	
27	0.09	
28	0.08	
29	0	
30	0	

2014	Precip. (in)	Events
May	sum	
1	0	
2	0	
3	0.08	
4	0.33	
5	0.19	
6	0	
7	0	
8	0.65	
9	0.58	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0.22	
24	0	
25	0.11	
26	0.1	
27	0	

Date	Precip. (in)	Events
28	0	
29	0.08	
30	0	
31	0	

2014	Precip. (in)	Events
Jun	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0.02	
11	0	
12	0.02	
13	0.49	
14	0.07	
15	0.04	
16	0.01	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0.16	
28	0.03	
29	0.05	
30	0	

2014	Precip. (in)	Events
Jul	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0.02	
20	0	
21	0	
22	0	
23	1	
24	0.36	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	

2014	Precip. (in)	Events
Aug	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0.01	
13	0.37	
14	0.32	
15	0	
16	0.87	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0.04	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0.05	
31	0	

2014	Precip. (in)	Events
Sep	sum	
1	0	
2	1.12	
3	0.01	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0.06	
18	0.12	
19	0.03	
20	0	
21	0	
22	0.01	
23	0.21	
24	0.36	
25	0	
26	0.35	
27	0	

Date	Precip. (in)	Events
28	0	
29	0	
30	0	
2014	**Precip. (in)**	**Events**
Oct	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0.5	
12	0.01	
13	1.87	
14	0.37	
15	0.23	
16	0	
17	0.04	
18	0	
19	0.01	
20	0.09	
21	0.05	
22	0.28	
23	0.19	
24	0.06	
25	0.41	
26	0.21	
27	0	
28	0.06	
29	0.21	
30	0.26	
31	0.58	
2014	**Precip. (in)**	**Events**
Nov	sum	
1	0	
2	0.03	
3	0.27	
4	0.22	
5	0.09	
6	0.22	
7	0	
8	0	
9	0.15	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0.93	
18	0	
19	0	
20	0.02	
21	0.24	
22	0.22	
23	0.37	
24	0.27	
25	0.55	
26	0.01	
27	0.01	
28	0.72	
29	0	
30	0	
2014	**Precip. (in)**	**Events**
Dec	sum	
1	0	
2	0	
3	0	
4	0.06	
5	0.03	
6	0.16	
7	0	
8	0.34	
9	0.18	
10	0.42	
11	0.44	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0.07	
18	0.09	
19	0	
20	0.31	
21	0.03	
22	0	
23	0.56	
24	0.21	
25	0	
26	0	
27	0.26	
28	0.06	
29	0	
30	0	
31	0	
2015	**Precip. (in)**	**Events**
Jan	sum	
1	0	
2	0.14	
3	0	
4	0.72	
5	1.6	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0.08	
12	0	
13	0	
14	0	
15	0	
16	0.03	
17	0.29	
18	0.23	
19	0.13	
20	0	
21	0	
22	0.06	
23	0.43	
24	0.16	
25	0	
26	0	
27	0	
28	0	

Date	Precip. (in)	Events
29	0	
30	0	
31	0	

2015	Precip. (in)	Events
Feb	sum	
1	0.02	
2	0.17	
3	0.07	
4	0.11	
5	0.11	
6	0.09	
7	0.51	
8	0.11	
9	0.11	
10	0.26	
11	0	
12	0	
13	0.21	
14	0.02	
15	0	
16	0	
17	0	
18	0	
19	0.15	
20	0.07	
21	0	
22	0	
23	0	
24	0	
25	0.03	
26	0	
27	0.26	
28	0	

2015	Precip. (in)	Events
Mar	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0.06	
12	0	
13	0	
14	0.19	
15	0.76	
16	0	
17	0	
18	0	
19	0.12	
20	0.05	
21	0.42	
22	0.01	
23	0	
24	0.04	
25	0.15	
26	0	
27	0.21	
28	0.01	
29	0	
30	0.01	
31	0.07	

2015	Precip. (in)	Events
Apr	sum	
1	0.02	
2	0.01	
3	0.97	
4	0.03	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0.02	
11	0.04	
12	0.03	
13	0.12	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0.03	
22	0.12	
23	0.32	
24	0.03	
25	0.11	
26	0	
27	0.02	
28	0	
29	0	
30	0	

2015	Precip. (in)	Events
May	sum	
1	0	
2	0	
3	0	
4	0.06	
5	0.45	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0.09	
14	0.01	
15	0	Fog
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0.01	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0	Fog

Date	Precip. (in)	Events
2015	Precip. (in)	Events
Jun	sum	
1	0.04	
2	0.14	
3	0.02	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0.24	
19	0.01	
20	0	Fog
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0.01	
30	0	
2015	Precip. (in)	Events
Jul	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	Fog

Date	Precip. (in)	Events
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	
31	0.03	
2015	Precip. (in)	Events
Aug	sum	
1	0	
2	0	
3	0	
4	0	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0	
13	0	
14	0.22	
15	0	
16	0	Fog
17	0	Fog
18	0	
19	0	
20	0	

Date	Precip. (in)	Events
21	0.05	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0	
28	0.09	
29	0.35	
30	0.34	
31	0.26	
2015	Precip. (in)	Events
Sep	sum	
1	0.42	
2	0.18	
3	0.01	
4	0.21	Fog
5	0	Fog
6	0.44	Fog
7	0	Fog
8	0.02	
9	0	Fog
10	0	Fog
11	0	
12	0	
13	0	Fog
14	0	
15	0	
16	0	
17	0.1	
18	0.21	
19	0	
20	0.38	Fog
21	0	Fog
22	0	
23	0	
24	0.06	
25	0.03	Fog
26	0	Fog
27	0	
28	0	Fog
29	0	Fog
30	0	

Date	Precip. (in)	Events
2015	Precip. (in)	Events
Oct	sum	
1	0	Fog
2	0	Fog
3	0	
4	0	
5	0	
6	0	
7	0.48	
8	0	Fog
9	0	Fog
10	0.24	
11	0	
12	0.04	
13	0	
14	0	Fog
15	0	
16	0	
17	0	
18	0	
19	0	Fog
20	0	Fog
21	0	Fog
22	0	Fog
23	0	Fog
24	0	Fog
25	0.4	
26	0.01	
27	0	
28	0.42	
29	0.09	
30	0.27	
31	1.25	
2015	Precip. (in)	Events
Nov	sum	
1	0.76	
2	0	Fog
3	0.04	Fog
4	0	
5	0.31	Fog
6	0	
7	0.87	
8	0.05	Fog
9	0	Fog
10	0.1	Fog
11	0.03	
12	0.6	
13	1.45	
14	0.84	
15	0.47	Fog
16	0.06	
17	1.24	
18	0	
19	0	
20	0	
21	0	
22	0	
23	0.25	
24	0.02	
25	0	
26	0	
27	0	
28	0	
29	0	Fog
30	0	Fog
2015	Precip. (in)	Events
Dec	sum	
1	0.07	
2	0.01	
3	0.29	Fog
4	0.26	
5	0	
6	0.14	
7	0.08	
8	0.84	
9	0.29	
10	0.23	
11	0	
12	0.2	
13	0.29	
14	0	Fog
15	0.26	Fog
16	0	Fog
17	0.43	
18	0.45	
19	0	
20	0.12	
21	0.52	
22	0.15	
23	0.28	
24	0.1	
25	0	
26	0	
27	0.39	
28	0.01	Fog
29	0	
30	0	
31	0	
2016	Precip. (in)	Events
Jan	sum	
1	0	
2	0	Fog
3	0	
4	0.01	
5	0.06	
6	0	
7	0	Fog
8	0	
9	0	
10	0	
11	0	
12	0.03	
13	0.14	
14	0	
15	0	
16	0.16	
17	0.02	
18	0	
19	0.16	
20	0.05	
21	0.14	
22	0.23	
23	0.4	
24	0	
25	0	
26	0.04	
27	0.01	
28	0.15	
29	0.17	
30	0.12	
31	0.06	

Date	Precip. (in)	Events
2016	Precip. (in)	Events
Feb	sum	
1	0	Fog
2	0	
3	0.06	
4	0	
5	0.09	
6	0.01	
7	0	
8	0	
9	0	
10	0.08	Fog
11	0.29	Fog
12	0.51	
13	0.26	
14	0.3	
15	1.5	
16	0.06	Fog
17	0.5	
18	0.04	
19	0.37	
20	0	
21	0	
22	0	
23	0	
24	0	
25	0	
26	0.01	
27	0	Fog
28	0.07	
29	0	

2016	Precip. (in)	Events
Mar	sum	
1	0.24	
2	0	
3	0.03	
4	0.06	
5	0	
6	0.04	
7	0.93	
8	0	
9	0.04	
10	0	
11	0.06	
12	0	
13	0.07	
14	0.3	
15	0.09	
16	0	Fog
17	0	
18	0	
19	0	
20	0.03	
21	0	
22	0.09	
23	0.36	
24	0.12	
25	0	
26	0.1	
27	0.25	
28	0	
29	0	
30	0	
31	0	

2016	Precip. (in)	Events
Apr	sum	
1	0	Fog
2	0	
3	0.03	
4	0.67	
5	0	
6	0	
7	0	
8	0	
9	0	
10	0	
11	0	
12	0.2	
13	0.14	
14	0.08	
15	0	
16	0	
17	0	
18	0	
19	0	
20	0	
21	0	
22	0.37	
23	0.36	
24	0.09	
25	0	
26	0	
27	0	
28	0	
29	0	
30	0	

2016	Precip. (in)	Events
May	sum	
1	0	
2	0	
3	0	
4	0.03	
5	0	
6	0	
7	0	
8	0.03	
9	0	Fog
10	0	
11	0	
12	0	
13	0	
14	0	
15	0	
16	0	
17	0	
18	0.16	
19	0.21	
20	0	
21	0.11	
22	0	
23	0	
24	0	
25	0	
26	0	
27	0.04	
28	0.18	
29	0.26	
30	0	
31	0	

2016	Precip. (in)	Events

Date	Precip. (in)	Events	Date	Precip. (in)	Events	Date	Precip. (in)	Events
Jun	sum		12	0.01				
1	0.05		13	0				
2	0.03		14	0				
3	0		15	0				
4	0		16	0				
5	0		17	0				
6	0		18	0				
7	0		19	0				
8	0		20	0				
9	0		21	0				
10	0.04		22	0.03				
11	0		23	0				
12	0		24	0	Fog			
13	0.43		25	0				
14	0.27		26	0				
15	0.01		27	0	Fog			
16	0							
17	0.01							
18	0.46							
19	0							
20	0							
21	0							
22	0							
23	0.34							
24	0.02							
25	0							
26	0							
27	0							
28	0							
29	0							
30	0							

2016	**Precip. (in)**	**Events**
Jul	sum	
1	0	
2	0	
3	0	
4	0	
5	0.01	
6	0	
7	0	
8	0	
9	0.16	
10	0	
11	0	